

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

H.B., )  
 )  
 Plaintiff, ) CIVIL ACTION FILE  
 v. ) NO. 1:22-CV-01181-JPB  
 )  
 RED ROOF INNS, INC.; and )  
 FMW RRI I, LLC. )  
 )  
 Defendants.

**DEFENDANT FMW RRI I, LLC.'S OBJECTIONS AND RESPONSES TO  
PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW FMW RRI I, LLC (hereinafter "FMW" or "Defendant), a Defendant in the above-captioned civil action, and hereby responds to Plaintiffs' First Request for Production of Documents to Defendant FMW RRI I, LLC, as follows:

**PRELIMINARY STATEMENT**

1. The following Responses are based upon information presently available to Defendant, which Defendant believes to be correct. These Responses are made without prejudice to its right to utilize subsequently discovered facts.
2. No incidental or implied admissions of fact by Defendant is made by the Responses below. The only admissions are express admissions. The fact that Defendant has responded to any Requests herein may not be properly taken as an admission that Defendant accepts or admits the existence of any facts set forth or assumed by such Requests, or that such Responses constitute admissible evidence. The fact that Defendant has responded to part or all of the Requests is not intended to be, and shall not be construed to be, a waiver by Defendant of all or any part of any

**Subject to objections, this Defendant has no documents responsive to this Request.**

19.

All reports and/or documents or records of any kind received from any experts who have investigated any issue relevant to the subject incident and relevant to this lawsuit. Also, please produce the entire file of all experts, including all materials relied upon by each expert in formulating their opinions and conclusions and all records created by any expert.

**RESPONSE: Defendant has no documents responsive to this Request at this time.**

**Defendant reserves the right to supplement this response as discovery progresses and as required by the Georgia Civil Practice Rules.**

20.

All documents evidencing the name and contact information (address, phone number, email) for all employees who worked at the Hotel at any point from 2007 through 2012, including the complete personnel file of same.

**RESPONSE: Defendant objects to this Request as over-burdensome, overbroad and not reasonably calculated to lead to the discovery of admissible evidence because it is not limited to the relevant time period.**

**Subject to objection, this Defendant did not employee any individual who worked at the Premises and therefore has no documents responsive to this Request.**

21.

All records, documents, notes, memoranda, minutes, and all other items evidencing all safety and/or security meetings related to the Hotel from 2007 to January 2012.

42.

Any and all documents that you contend support any defense you will allege in this case.

**RESPONSE: Defendant objects to this Request to the extent it seeks information or documentation protected from disclosure pursuant to attorney client privilege and/or work product doctrine and/or was made in anticipation of litigation and/or exceeds the permissible scope of discovery.**

**Subject to and without waiving this objection, see Red Roof Inns, Inc.'s document production.**

Respectfully submitted this 19th day of August, 2022.

*/s/ Tameika L. Briscoe* \_\_\_\_\_

CHARLES K. REED  
Georgia Bar No. 597597  
ADI ALLUSHI  
Georgia Bar No. 852810  
TAMEIKA L. BRISCOE  
Georgia Bar No. 517405

*Attorneys for Defendants FMW RRI I, LLC*

LEWIS BRISBOIS BISGAARD  
& SMITH LLP  
600 Peachtree Street NE  
Suite 4700  
Atlanta, Georgia 30308  
(404) 348-8585  
(404) 467-8845 Facsimile  
[Chuck.Reed@lewisbrisbois.com](mailto:Chuck.Reed@lewisbrisbois.com)  
[Adi.Allushi@lewisbrisbois.com](mailto:Adi.Allushi@lewisbrisbois.com)  
[Tameika.Briscoe@lewisbrisbois.com](mailto:Tameika.Briscoe@lewisbrisbois.com)